

UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

CALIFORNIA

UNSEALED 8/12/08
SEALED

In the Matter of the Search of
(Name, address or brief description of person, property or premises to be searched)

APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT

ELLA LOUISE SANDERS
BUREAU OF PRISONS# 09885-298

Case Number:

'08 MJ 8645

I, STEVEN S. HYMAS being duly sworn depose and say:

I am a(n) Special Agent with Federal Bureau of Investigation and have reason to believe
Official Title

that ☒ on the person of or ☐ on the property or premises known as (name, description and/or location)

ELLA LOUISE SANDERS
BUREAU OF PRISONS# 09885-298

in the SOUTHERN District of CALIFORNIA

there is now concealed a certain person or property, namely (describe the person or property to be seized)

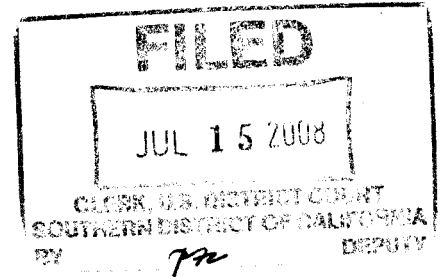
REFER TO ATTACHMENT A

which is (state one or more bases for search and seizure set forth under Rule 41(c) of the Federal Rules of Criminal Procedure)
evidence of the commission of a criminal offense.

concerning a violation of Title 18 United States Code, Section(s) 2332a, 2332a(a)(3), 844(f)(1) & 924(c)

The facts to support a finding of probable cause are as follows:

REFER TO ATTACHED AFFIDAVIT OF FBI SPECIAL AGENT HYMAS.



Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Steve Hymas
Signature of Affiant

Sworn to before me and subscribed in my presence,

July 15, 2008 @ 10:25 a.m. at
Date

EL CENTRO
City

CALIFORNIA
State

Peter C. Lewis
Name of Judge

U.S. Magistrate Judge
Title of Judge

[Signature]
Signature of Judge

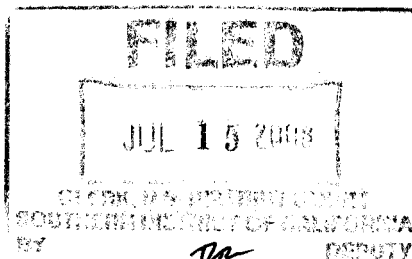
ATTACHMENT A

ITEMS TO BE SEIZED

The items to be seized are evidence of violations of 18 U.S.C. § 2332a, 18 U.S.C. § 2332a(a)(3), 18 U.S.C. § 844, and 18 U.S.C. § 924(c), specifically:

No fewer than twenty-five (25), and no more than forty (40) full length head hairs (not cut), and ten (10) head hair combings.

Busn
FOR WILLIAMS
CULC 0084



'08 MJ 8645

IN THE MATTER OF THE SEARCH OF) Magistrate Case No.: _____
RACHELLE LYNETTE CARLOCK)
Bureau of Prisons# 06313-298) AFFIDAVIT OF FBI SPECIAL AGENT
ELLA LOUISE SANDERS) STEVEN S. HYMAS IN SUPPORT OF
Bureau of Prisons# 09885-298) SEARCH WARRANT APPLICATION

I, Steven S. Hyman, being first duly sworn, hereby depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I have been so employed for approximately five months. I am currently assigned to the Imperial County Resident Agency of the San Diego Field Office.

2. I received extensive training in the preparation and execution of search warrants while at the FBI Academy in Quantico, Virginia.

3. The information set forth in this affidavit was communicated to me by Special Agent W. David Pleasance of the FBI's San Diego Field Office. Special Agent Pleasance relied on his personal knowledge of the investigation described herein, as well as information made available to him by other law enforcement officers and agencies. Because this affidavit is being submitted for the limited purpose of obtaining a search warrant for the

1 persons of Ella Louise Sanders and Rachelle Lynette Carlock, I have
2 not set forth each and every detail obtained over the course of
3 this investigation, but rather only those facts and circumstances
4 that I believe are necessary to establish probable cause to believe
5 that evidence of federal violations, as described hereafter, are
6 presently located on the persons of Ella Louise Sanders and
7 Rachelle Lynette Carlock.

8 VIOLATIONS BEING INVESTIGATED

9 4. Special Agent Pleasance is investigating violations of
10 the following statutes, among others: Title 18, United States Code,
11 Section 2332a (Conspiracy to Use a Weapon of Mass Destruction);
12 Title 18, United States Code, Section 2332a(a)(3) (Use of a Weapon
13 of Mass Destruction); Title 18, United States Code, Section
14 844(f)(1) (Malicious Damage to Buildings or Real Property by Means
15 of an Explosive); and Title 18, United States Code, Section 924(c)
16 (Possession of Destructive Device in Relation to a Crime of
17 Violence), arising from the use of pipe bombs in the Southern
18 District of California, including the bombing of the Edward J.
19 Schwartz Federal Courthouse (hereinafter "courthouse"), located at
20 940 Front Street, San Diego, California.

21 PERSONS TO BE SEARCHED

22 5. Based on the facts and circumstances laid out below, I
23 believe probable cause exists that justifies:

- 24 (a) the search of Ella Louise Sanders and the seizure of
25 samples of her head hair. Sanders is a black female
26 approximately sixty-three inches tall and 56 years of
27

age, whose Bureau of Prisons Register Number is 09885-298. She is presently in the custody of the San Diego Metropolitan Correctional Center, run by the United States Bureau of Prisons, located at 808 Union Street, San Diego, California, 92101;

- (b) the search of Rachelle Lynette Carlock and the seizure of samples of her head hair. Carlock is a black female approximately sixty three inches tall and 31 years of age, whose Bureau of Prisons Register Number is 06313-298. She is presently in the custody of the Western Region Detention Facility at San Diego, run by The GEO Group, Inc., located at 220 C Street, San Diego, California 92101. She was indicted by a federal grand jury in the Southern District of California on June 10, 2008 (Criminal Case No. 08-CR-1895-MMM), for Use of False Identification to obtain Explosive Materials (18 U.S.C. §§ 842(a)(2) and 844(a)), Felon in Possession of Explosive Materials (18 U.S.C. § 842(i)(1)), and Fraud in Connection with Identification Documents (18 U.S.C. § 1028A(a)(7) and (b)(2)(B)).

THE RECENT BOMBINGS IN SAN DIEGO

6. On April 25, 2008, at approximately 1:30 a.m., an explosive device detonated at the Federal Express Distribution Center in San Diego, California. On May 4, 2008, at approximately 1:41 a.m., a bomb was detonated adjacent to the eastern entrance (front doors) of the federal courthouse in San Diego, California.

INITIAL FBI INVESTIGATION

7. Representatives of multiple state and federal public safety agencies, including the Federal Bureau of Investigation (FBI), responded to the courthouse. During the response, surveillance videos that captured images of the bomber were located. A review of these surveillance videos revealed that an individual approached the front of the courthouse and placed a bag up against a glass pane. The individual stooped over and ignited the bag. The bag was immediately engulfed in flames, suggesting that it had been saturated with a volatile and flammable substance. It continued burning, with flames reaching multiple feet in height, and shortly thereafter detonated. Among other features, the subject appeared to have dark hair hanging past the shoulders and a dark knit cap over the crown of the head. The person began sprinting away from the device as soon as it was engulfed in flames.

8. Surveillance footage also showed the bombing suspect sprinting away from the vicinity of the burning bag southbound, through trees and grass, and toward the bridgeway over Front Street. The device detonated after the suspect was approximately 100 meters from the front of the building.

EVIDENCE RECOVERED AT THE COURTHOUSE

9. An FBI Evidence Response Team (ERT) collected physical evidence of the bombing. The ERT collected multiple pieces of debris believed to have originated from the explosive device. Several pieces of metal debris were enmeshed in tattered pieces of

1 white fabric, which appeared to have been part of the device prior
2 to its detonation. A piece of pipe fragment had adhesive tape
3 fragments attached to it. The evidence was sent to the FBI's
4 Laboratory in Quantico, Virginia.

5 INVESTIGATION OF CONNECTIONS BETWEEN TWO BOMBINGS

6 10. Investigators, on the morning of May 4, 2008, considered
7 whether the earlier bombing on April 25, 2008, at the Federal
8 Express Distribution Center in San Diego, California, was related
9 to the federal courthouse bombing. Accordingly, the physical
10 evidence from the Federal Express Distribution Center bombing was
11 taken into FBI custody and sent to the FBI Laboratory for
12 comparative analysis.

13 11. The law enforcement officers who investigated the Federal
14 Express device explained that it consisted of two pipe bombs. One
15 of them detonated first, apparently extinguishing the ignition
16 device on the other pipe bomb, leaving it unexploded in the nearby
17 parking lot where it came to rest.

18 PRELIMINARY LABORATORY ANALYSIS

19 12. The FBI laboratory reported that the unexploded pipe bomb
20 recovered at the Federal Express Distribution Center contained
21 powder that was preliminarily determined to be consistent with
22 *Hodgdon's TRIPLE SE7EN* (trademarked spelling) brand powder in the
23 FFG granular size. This powder appears to be an improvement on,
24 and a derivative of, an earlier *Hodgdon* product called *Pyrodex*.
25 Both are considered to be black powder substitutes. The analysis
26 of the bulk powder from this device also indicated that gasoline
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1 was present.

2 13. The FBI laboratory reported that residue from the pipe
3 bomb that did explode at the Federal Express Distribution Center
4 was preliminarily consistent with Pyrodex or black powder.

5 14. The FBI laboratory reported that the dimensions of the
6 two pipes used in the Federal Express Distribution Center bombing
7 were identical. They were of one inch nominal diameter and eight
8 inches in length. The pipe bomb that detonated had a product
9 identification sticker on it. The sticker provided the following
10 information regarding the pipe - "1" x 8" GALV STEEL PIPE NIPPLE."

11 15. The FBI laboratory reported that the device used at the
12 federal courthouse consisted of three separate pipe bombs. One
13 consisted of a two inch nominal diameter pipe nipple that was ten
14 inches in length while the other two were one and a half inch
15 nominal diameter pipe nipples that were ten inches in length. All
16 three were made of galvanized steel. Preliminary examination of
17 residue from fragments of these pipes indicated it was consistent
18 with Pyrodex or black powder. Additionally, gasoline was
19 identified on fragments of the black cloth material that came from
20 the back pack destroyed during the fire and bomb detonation.

21 16. Debris from both bombings indicated that nails were
22 incorporated into their design. Your affiant is aware, because of
23 information received from SA Pleasance, that additional metal
24 components, such as nails, are usually added to bombs in order
25 provide an enhanced anti-personnel effect upon detonation.
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1 17. The FBI Laboratory conducted a search for trace evidence,
2 such as hairs, fibers, powders, et cetera, on the evidence items
3 collected at the scenes of the two bombings. The Laboratory was
4 able to identify head hairs in the evidence submitted from each of
5 the bombing locations. The head hairs were located underneath tape
6 affixed to metal pipe fragments. The Laboratory indicated that
7 they had the ability to compare these hairs with the hairs of
8 individuals suspected of involvement with the bombing. Karen Lowe
9 of the FBI's Explosives Unit explained to Special Agent Pleasance
10 that to conduct such a comparison, a suitable head hair sample
11 would consist of at least 25 full length (not cut) hairs collected
12 from all areas of the head and head hair combings.

13 CARLOCK'S STATEMENTS

14 18. On May 15, 2008, investigating agents interviewed
15 Rachelle Lynette Carlock at the FBI's San Diego Field Office.
16 Carlock acknowledged and waived her Miranda rights before the
17 interview. The following two paragraphs include only some of the
18 statements made by Carlock during the ensuing interview.

19 19. Carlock admitted that on at least two occasions she used
20 a false identification card to purchase gunpowder at the El Cajon
21 Gun Exchange. She stated that she gave the gunpowder to her
22 friend, Louise "Weezy" Sanders.

23 20. Carlock told the agents that Sanders was directing her to
24 purchase the gunpowder and metal pipes. She stated that Sanders
25 may or may not have been with her when she purchased the gunpowder
26 and pipes. After the investigators stated that they knew it was
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1 Carlock who planted the bomb at the courthouse and asked her if she
2 meant to hurt anyone, she stated "I think it was put there to send
3 a message, I wouldn't hurt nobody." When asked for further
4 details, Carlock stated: "I told you who told me to do it, Weezy.
5 I don't know if Weezy has federal or state cases. I've never had
6 a federal case." Carlock went on to state, "You got me on video
7 tape, I don't give a fuck. I don't know why I did it, I really
8 don't."

9 SANDERS' STATEMENTS

10 21. On May 15, 2008, Ella Louise Sanders was interviewed by
11 investigators and Sanders stated that Carlock was responsible for
12 the construction and placement of the pipe bombs at the Federal
13 Express store in San Diego and the courthouse. Among other things,
14 Sanders stated that Carlock built the bombs at a residence in
15 Menifee, California, and that Sanders witnessed the construction of
16 those devices. Sanders indicated that she was aware of the
17 locations where pipe bombs were tested and constructed. She was
18 taken from the Riverside Superior Court so she could point out the
19 locations on the ground. She identified an open field where she
20 stated devices were tested. She also identified a residence in
21 Menifee, California, where bombs were constructed.

22 22. A search of the field yielded an unexploded pipe bomb.
23 A search of the residence also yielded an unexploded pipe bomb. On
24 May 16, 2008, Sanders was interviewed by investigating agents.
25 After acknowledging and waiving her Miranda rights, Sanders
26 admitted building two pipe bombs with Carlock. She admitted
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1 stealing pipe components from the Home Depot, and she also admitted
2 buying one pound of powder from the El Cajon Gun Exchange. Sanders
3 described how she and Carlock built two bombs by filling the pipe
4 with powder, inserting a fuse and closing the pipe with an end cap.
5 Sanders admitted to helping Carlock braid the fuse out of strips of
6 material. Sanders stated that they built the two bombs in the
7 garage of the residence in Menifee.

8 23. Sanders stated that she and Carlock tried to detonate the
9 first device in a field, but it failed to detonate. She stated
10 that Carlock successfully detonated the second device down the
11 street from the residence in Menifee. According to Sanders, she
12 then helped Carlock steal more pipe materials from the Home Depot.

13 24. Sanders stated that Carlock was responsible for the
14 Federal Express bombing and that she acted alone. Sanders stated
15 that Carlock bragged to her about bombing the Federal Express
16 office. As for the courthouse, Sanders stated that Carlock was the
17 individual who built and placed the bomb at the courthouse. Among
18 other things, Sanders stated that, on the night of the courthouse
19 bombing, she helped Carlock conceal her hair underneath a beanie
20 cap. Sanders stated that she saw Carlock place the bomb in a
21 backpack along with a container of gasoline. Sanders stated that
22 an individual named Eric Robinson drove Carlock to San Diego and
23 dropped her off approximately two blocks from the courthouse.
24 According to Sanders, Carlock then placed the bomb at the
25 courthouse doors, lit the bag on fire, and ran. Sanders stated
26 that Carlock returned to the Menifee residence between 2:00 a.m.
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1 and 3:00 a.m. When Sanders asked what Carlock had done, Carlock
2 responded, "I put the bomb in front of the courthouse."

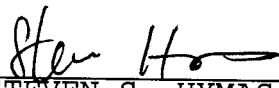
3 25. On May 20, 2008, Sanders again acknowledged and waived
4 her Miranda rights and was interviewed concerning the bombings.
5 Sanders stated that she helped Carlock build four devices, that two
6 failed to detonate, and that Carlock told her the other two devices
7 successfully detonated near the house in Menifee. Sanders also
8 stated, among other things, that the night before the courthouse
9 bombing she helped Carlock get ready to deliver a bomb to what
10 Sanders believes was to be the Social Security Office. Sanders
11 stated that she saw Carlock build "three fat ones" identical to the
12 bombs previously built, and that the three devices were wrapped
13 together with silver duct tape. Sanders found dark clothing for
14 Carlock and helped conceal her hair. Then, at about midnight on
15 May 3, 2008, Sanders saw Carlock and Eric Robinson leave the
16 Menifee residence with the backpack carrying the bomb. Sanders
17 stated that later, at about 3:30 a.m., Carlock and Robinson
18 returned to the Menifee residence. According to Sanders, Carlock
19 stated, among other things, that she, "Put that mother fucker at
20 the courthouse."

21 CONCLUSION

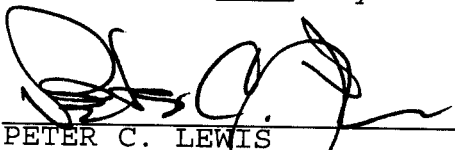
22 26. Based on the aforementioned information, this affiant
23 submits that there is probable cause to believe that evidence of
24 violations of 18 U.S.C. § 2332a (Conspiracy to Use a Weapon of Mass
25 Destruction), 18 U.S.C. § 2332a(a)(3) (Use of a Weapon of Mass
26 Destruction), 18 U.S.C. § 844 (Malicious Damage to Buildings or
27

1 Real Property by Means of an Explosive), and 18 U.S.C. § 924(c)
2 (Possession of Destructive Device in Relation to a Crime of
3 Violence) will be found on the persons of Rachelle Lynette Carlock
4 and Ella Louise Sanders. Specifically, based on: (1) the discovery
5 of head hairs in the evidence collected from the two bombing
6 scenes; (2) Carlock's statements concerning her role in the
7 courthouse bombing; (3) Sanders' description of her and Carlock's
8 participation in, and/or witnessing of, the construction of pipe
9 bombs at the residence in Menifee; (4) Sanders' description of the
10 device in the backpack taken by Carlock on the night of the
11 courthouse bombing, and (5) Sanders' statements concerning how she
12 helped conceal Carlock's hair, there is probable cause to believe
13 that hairs identified in the submitted evidence were deposited by
14 Carlock and/or Sanders. Obtaining hair samples from Carlock and
15 Sanders will allow the laboratory to compare those samples to the
16 hairs recovered from the courthouse bombing scene.

17 27. Your affiant, therefore, respectfully requests that the
18 attached warrant be issued authorizing the search and seizure of
19 the items listed in Attachment A.

20 
21 STEVEN S. HYMAS
22 Special Agent
Federal Bureau of Investigation

23 Sworn and subscribed before me this 15th day of July, 2008.

24 
25 PETER C. LEWIS
26 U. S. Magistrate Judge
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